

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

SAFT AMERICA, INC.)	
)	
Plaintiff,)	
)	
vs.)	
)	
PRECISION DRAWN METALS, INC.,)	
)	
Defendant-Third Party Plaintiff,)	CASE NO. 3:21CV35
)	
vs.)	
)	
THOMAS STEEL STRIP)	
CORPORATION,)	
)	
Third-Party Defendant)	
)	
and)	
)	
ACUITY, A MUTUAL INSURANCE)	
COMPANY,)	
)	
Intervening Defendant.)	

**DEFENDANT PRECISION DRAWN METALS, INC.’S NOTICE OF MOTION AND
MOTION IN LIMINE REGARDING DAMAGES**

PLEASE TAKE NOTICE that Defendant Precision Drawn Metals, Inc., by its attorneys, von Briesen & Roper, s.c., hereby moves this Court to issue an order *in limine* regarding plaintiff Saft America, Inc’s claimed damages for purposes of trial. Defendant’s motion specifically requests Saft be precluded from offering any evidence at trial related to its damage claim of over \$1 million for having to scrap the metal cans in question; the \$314,212 for line downtime; and an award of attorneys’ fees.

This motion is based on the pleadings on file herein, along with the defendant's brief in support of the motion and the declaration of Michael P. Crooks, which are being filed contemporaneously with this motion.

Dated this 20th day of September, 2022.

von BRIESEN & ROPER, S.C.
Attorneys for Defendant
Precision Drawn Metals, Inc.

By: /s/ Michael P. Crooks

Michael P. Crooks
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